

JAN 17 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA

v.

DOMINICK VERSHON COLE,
a/k/a "Pooh",
Defendant

DOCKET NO. 3:24-cr-4-FDW

BILL OF INDICTMENT

Violation: 21 U.S.C. § 841(a)(1)
21 U.S.C. § 846
18 U.S.C. § 922(g)

THE GRAND JURY CHARGES:

COUNT ONE

(Distribution of Methamphetamine)

On or about July 10, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DOMINICK VERSHON COLE,
a/k/a "Pooh",

did knowingly and intentionally distribute a controlled substance, to wit: a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Methamphetamine Involved

With respect to defendant **DOMINICK VERSHON COLE, a/k/a "Pooh"**, the offense charged in Count One involved fifty (50) grams or more of methamphetamine (actual). Accordingly, Title 21, United States Code, Section 841(b)(1)(A) applies.

COUNT TWO

(Distribution of Methamphetamine)

On or about July 17, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

DOMINICK VERSHON COLE,
a/k/a "Pooh",

did knowingly and intentionally distribute a controlled substance, to wit: a mixture and substance

containing a detectable amount of methamphetamine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Methamphetamine Involved

With respect to defendant **DOMINICK VERSHON COLE, a/k/a “Pooh”**, the offense charged in Count Two involved fifty (50) grams or more of methamphetamine (actual). Accordingly, Title 21, United States Code, Section 841(b)(1)(A) applies.

COUNT THREE

(Distribution of Methamphetamine)

On or about July 24, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

**DOMINICK VERSHON COLE,
a/k/a “Pooh”,**

did knowingly and intentionally distribute a controlled substance, to wit: a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Methamphetamine Involved

With respect to defendant **DOMINICK VERSHON COLE, a/k/a “Pooh”**, the offense charged in Count Three involved fifty (50) grams or more of methamphetamine (actual). Accordingly, Title 21, United States Code, Section 841(b)(1)(A) applies.

COUNT FOUR

(Possession of a Firearm by a Convicted Felon)

On or about August 2, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

**DOMINICK VERSHON COLE,
a/k/a “Pooh”,**

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess at least one firearm, to wit: A Glock, Model 17, 9mm handgun, in and affecting interstate commerce; in violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of 21 U.S.C. § 853, 18 U.S.C. § 924, and 28 U.S.C. § 2461(c). The following property is subject to forfeiture in accordance with Sections 853, 924, and/or 2461(c):

- a. All property which constitutes or is derived from proceeds of the violations set forth in this Bill of Indictment;
- b. All property used or intended to be used in any manner or part to commit or facilitate such violations;
- c. All firearms or ammunition involved or used in such violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant to the extent of the value of the property described in (a), (b), and (c).

A TRUE BILL



FOREPERSON

DENA J. KING
UNITED STATES ATTORNEY


ALFREDO DE LA ROSA
ASSISTANT UNITED STATES ATTORNEY